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Indian Harbor Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KALEAB MEKURIYA,

Plaintiff,

v.

THE TRAVELERS INDEMNITY COMPANY;  
INDIAN HARBOR INSURANCE COMPANY,  
a Foreign Corporation; CONSTITUTION  
STATE SERVICES, LLC, a Foreign Limited  
Liability Company; DOES 1 through 10,  
inclusive and ROE CORPORATIONS 1 through  
10, inclusive,

Defendants.

CASE NO.: 2:22-cv-00214-JCM-EJY

**STIPULATION TO EXTEND  
DISCOVERY DEADLINES  
PURSUANT TO LR 26-3**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Kaleab Mekuriya, Defendant Indian Harbor Insurance Company. ("Indian Harbor"), The Travelers Indemnity Company and Constitution State Services, LLC, by and through their respective counsel, that the discovery deadlines of this matter be continued for a period of seventy-five (60) days to allow the parties to complete discovery and move this case towards resolution through private mediation.

**A. STATEMENT SPECIFYING THE DISCOVERY THAT HAS BEEN COMPLETED**

The following discovery has been completed by the parties:

1. Disclosure of Rule 26 Productions
2. Written discovery propounded by Plaintiff

**B. SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED**

The following discovery remains to be completed

1. Parties' initial disclosures
2. Defendants' issuance of subpoenas to Plaintiff's medical providers and employer
3. Initial expert disclosures
4. Defendants' service of first set of discovery
5. The Parties' rebuttal expert disclosures
6. Plaintiff's deposition
7. Deposition of the FRCP 30(b)(6) Witnesses of Defendants
8. Deposition of Plaintiff's relevant medical providers
9. Deposition of Plaintiff's retained experts
10. Any depositions or additional discovery Plaintiff may contemplate conducting.

**C. REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE DEADLINES CONTAINED IN THE AMENDED DISCOVERY SCHEDULING ORDER**

Additional time has been requested by the Defendants to produce documents in accordance with written discovery. Plaintiffs are concerned that the additional time given on discovery responses might adversely impact the amount of time experts have to review those documents once received. In order to avoid this issue, the parties have agreed to a 60-day extension of the following discovery deadlines.

**D. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

It is requested that all remaining discovery deadlines in this case be continued as follows:

<i>Discovery</i>	<i>Current Deadline</i>	<del><i>Proposed</i></del> <i>Deadline</i>
Initial Expert Disclosures	07/25/2022	09/26/2022
Last Day to Amend Pleadings and Add Parties	07/25/2022	09/26/2022
Rebuttal Expert Disclosures	08/24/2022	10/24/2022
Discovery Cut-Off	10/27/2022	12/27/2022

Dispositive Motions	11/28/2022	01/28/2023
Consolidated Pretrial Order	12/28/2022	02/28/2023

Dated: May 24, 2022

H&P LAW

CLYDE & CO US LLP

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 and Constitution State Services,  
 LLC*

IT IS SO ORDERED:

  
 UNITED STATES MAGISTRATE JUDGE

Dated: May 24, 2022